

**DECLARATION**

I Simon J. Rosen, Esq., hereby Declare under penalty of perjury that the following is true and correct, to the best of my knowledge information and belief:

1. I am counsel of record for defendants in this case.
2. The facts set forth in Motion for Enlargement of Time to file second supplemental responses to request for production of documents are accurate.
3. I have provided plaintiff with additional documents today in supplemental response to request for production of documents.
4. Subsequent to this Court's August 27, 2020 Order, plaintiff received hundreds of page of documents in the form of tax returns which were filed by the relevant companies doing business with defendants during the past 3 years; the identities of these companies was forthrightly divulged to plaintiff by defendants through discovery.
5. The documents requested date back 9 years, they related to three corporate defendants and one individual defendant, as well as documents pertaining to many third parties doing business with the defendants, and companies affiliated with defendants.
6. The defendants are primarily operated by one individual- co-defendant David Feldman (Sr.). Defendant Feldman is producing a boxing event in Daytona Beach, Florida which takes place on Friday September 11, 2020; David Feldman, Sr. has been preparing for this event full-time from the date of this Court's Order of August 27, 2020, through today.
7. On Tuesday, September 8, 2020, Mr. Feldman is scheduled to depart for Florida; his boxing business has suffered great losses due to the Covid-19 pandemic, due to the cancellation and postponement of live events; this upcoming event requires his full-time

devotion and resources, to curtail great business losses; he is to return to this District by Monday, September 14, 2020 and shall focus on spending the week to work to gather the requisite documentation.

8. To my knowledge, Mr. Feldman has cooperated with plaintiff, and shall continue to cooperate; and a short additional time, through September 18, 2020, shall enable defendants to full supplement their responses to request for production of documents.
9. During prior discussions with opposing counsel, and as suggest in such counsel's response to defendant's prior motion for enlargement, counsel is amenable to pushing back discovery and ensuing deadlines for a period of thirty days (30). This is an acceptable solution to abate any disruption to the parties in regard to completion of discovery; further, there has been no stonewalling, no evasion, no dereliction of duties here, by defendants or their counsel.

AND SO I DECLARE AS OF THIS DATE.

Dated: September 4, 2020

/Simon J. Rosen, Esq./

**EXHIBIT "A"**